

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC., et al.,)	Chapter 11
)	
Debtors.)	Jointly Administered
)	

NOTICE OF MOTION

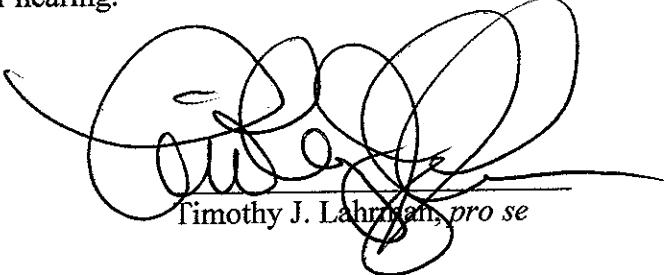
PLEASE TAKE NOTICE that on this date Timothy J. Lahrman did file his Rule 8002(c) motion to extend the deadline for filing a Notice of Appeal together with a supporting declaration together with a Verified Motion/Request for Reasonable Accommodations and that a hearing will be held on these motions before the Honorable Martin Glenn of the United States Bankruptcy Court for the Southern District of New York (the "*Bankruptcy Court*"), in Room 501, One Bowling Green, New York New York 10004-1408, on a date to be set by the Court and at the Court's earliest convenience.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motions and relief requested therein, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall set forth the basis for the objection and the specific grounds therefore and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399, by registered users of the Bankruptcy Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Bankruptcy Court), with a hard copy delivered directly to Chambers and served, so as to be received no later than _____ days prior to the scheduled hearing or as otherwise specified by any order from the Bankruptcy

Court, upon all parties to whom notice and service is due in these proceedings.

PLEASE TAKE FURTHER NOTICE that if you do not timely file and serve a written response to the relief requested in the Motions, the Bankruptcy Court may deem any opposition waived, treat the Motions as conceded, and enter an order granting the relief requested in the motion without further notice or hearing.

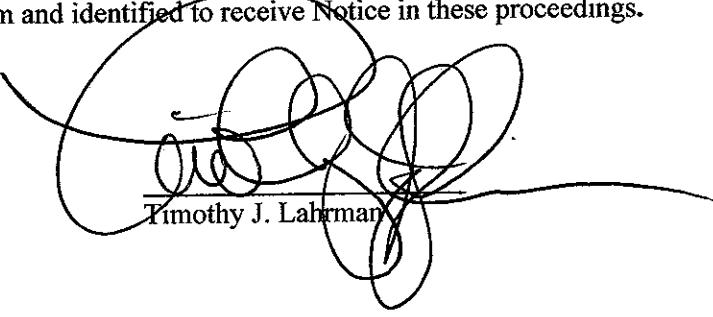
Dated: May 23, 2014



Timothy J. Lahrman, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that I am not an ECF/Pacer subscriber with access to electronic filing yet on May 24, 2014, via U.S. Postal Service over-night prepaid Priority Mail Express (article # EK 430207543 US) I filed the foregoing pleading or paper with the Clerk of the Court who, by entering the document into the CM/ECF system will cause to be sent a copy of this filing on all parties of record who are registered in and subscriber to the CM/ECF system and identified to receive Notice in these proceedings.



Timothy J. Lahrman

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MOTION TO EXTEND DEADLINE

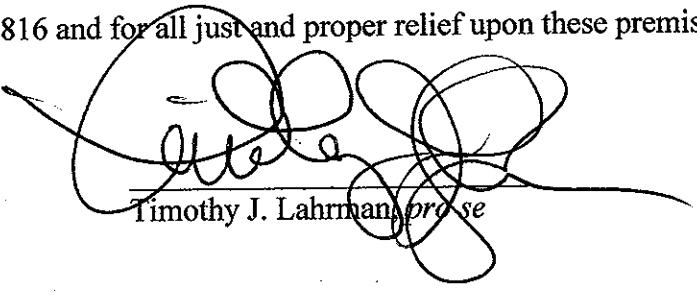
Pursuant to Bankruptcy Rule 8002(c) Lahrman respectfully requests that the deadline for filing a notice of appeal regarding Doc. 6816 be extended .

In support of this motion Lahrman submits his Declaration which accompanies this filing.

This motion is being made on or before the deadline for filing the notice of appeal and is therefore timely made.

Wherefore Lahrman prays for an Order from this Court extending the deadline to file a notice of appeal concerning Doc. 6816 and for all just and proper relief upon these premises.

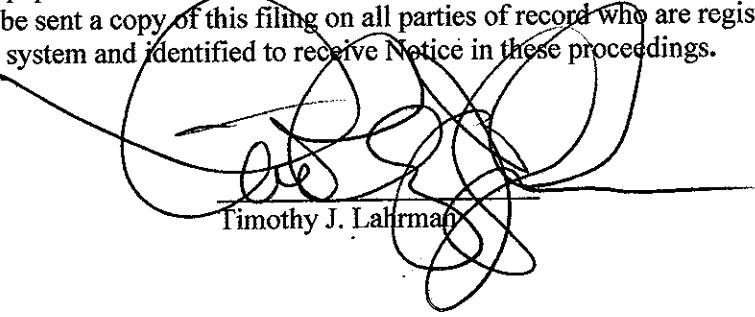
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DECLARATION OF TIMOTHY J. LAHRMAN

I, Timothy J. Lahrman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration on the basis of my personal knowledge of the facts stated herein;
2. On May 19, 2014 at approximately 4:47 pm (EST) I received via US daily mail the Order from this Court dated May 12, 2014. (Doc. 6886)
3. I was never served with a copy of Doc. 6886 by either the Court or Ally Financial, Inc. and, because I am appearing pro se in this matter and not a ECF/Pacer user or subscriber I never received Notice of the entry of Doc. 6886 until May 19, 2014 at or near the very end of the business day.
4. The copy of the Order [Doc. 6886] sent me was delivered in an undated pre-sorted postage pre-paid pre-printed envelope sent by Residential Capital, LLC. c/o KCC 2335 Alaska Ave El Segundo, CA. 90245, an entity from whom I have never before received mail relevant to this present matter as it involves Ally Financial, Inc. their legal counsel Kirkland & Ellis and myself.
5. Through no fault or neglect of my own doing, the 'Notice' received from Residential Capital, LLC. on what was substantively May 20, 2014 is/was insufficient, inadequate and untimely, such that I am prejudiced by receiving such late notice when all parties are aware that I am not a Pacer user/subscriber and that I likewise loose additional days because

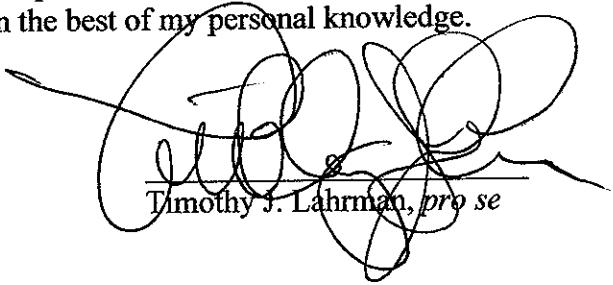
my return documents must be sent by US mail and received on the Court's deadline. In sum and in this particular instance, in spite of the Court granting a fourteen day extension, I have actually had only four days notice to act before the fourteen day deadline ran because my return filing relies on the US Mail for a Monday deadline which means I must mail my documents no later than Saturday, and still yet, I'll endure additional costs for the expediency of overnight express mail.

6. As I review my files regarding this matter I am noticing a disturbing pattern of conduct by Ally Financial regarding their communications and notices to me in this matter while bearing in mind their knowledge that I am in fact an adjudicated incapacitated person and a qualified individual with a disability.

7. This Declaration is submitted in support of my second Rule 8002(c) motion for an extension of time to file and serve a Notice of Appeal regarding Doc. 6816 as the same was entered in this matter on April 23, 2014.

I swear and affirm under the penalties of perjury that the foregoing facts and representations are true and within the best of my personal knowledge.

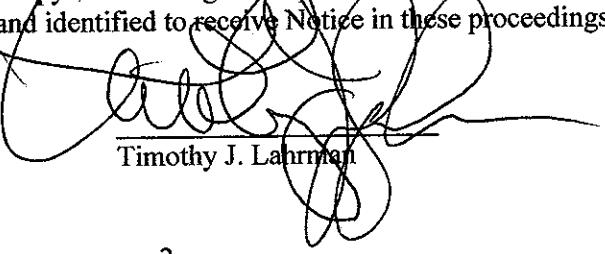
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Timothy J. Lahrman, pro se

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Timothy J. Lahrman